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9 *Optum Services, Inc.*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 RUTH M. CARTER,

13 Plaintiff,

14 vs.

15 OPTUM SERVICES, INC., d/b/a
16 SOUTHWEST MEDICAL PHARMACY
AND HOME MEDICAL EQUIPMENT;
17 DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive.

18 Defendants.
19

Case No. 2:24-cv-01717-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO SUBMIT
CONFIDENTIAL EARLY NEUTRAL
EVALUATION STATEMENT**

(FIRST REQUEST)

20 Plaintiff Ruth Carter (“Plaintiff”), by and through her counsel, the Holman Law Office, and
21 Defendant Optum Services, Inc. (“Defendant,” and together with Plaintiff, the “Parties”), by and
22 through its counsel, Jackson Lewis P.C., hereby move to extend the time to submit their Early
23 Neutral Evaluation (“ENE”) Statements to the Chambers of the Honorable Magistrate Judge
24 Maximiliano D. Couvillier, III, up to and including **Monday, April 7, 2022 by 4:00 p.m.**

25 This Stipulation is submitted and based upon the following:

26 1. On January 21, 2025, the Court entered an Order scheduling the ENE for April 8,
27 2025. ECF No. 11. The Court has since rescheduled the ENE to April 10, 2025 at 1:00 p.m. ECF
28 Nos. 14, 19.

2. The parties' ENE Statements are currently due on Thursday, April 3, 2025 at 4:00 p.m. ECF No. 11.

3. However, Defendant's counsel is scheduled to participate in an arbitration in an unrelated matter from March 31, 2025 to April 2, 2025, which involves many hours of preparation.

4. In addition, if the Stipulated Discovery Plan and Scheduling Order is adopted by the Court, the Parties' initial disclosures will be due on April 2, 2025, merely one day before their ENE Statements are due. The Parties believe that having additional time to review the initial disclosures will allow them to meaningfully share the information they acquire with the Court in their ENE Statements.

5. Accordingly, the Parties require additional time to prepare and submit their ENE Statements. Therefore, the Parties respectfully request an extension of time to submit their ENE Statements, by two (2) business days, up to and including Monday, April 7, 2025 by 4:00 p.m.

6. This is Parties' first request for an extension of time to submit their ENE Statements. This request is made in good faith and not for the purpose of delay.

DATED this 31st day of March, 2025.

HOLMAN LAW OFFICE

/s/Kristina S. Holman

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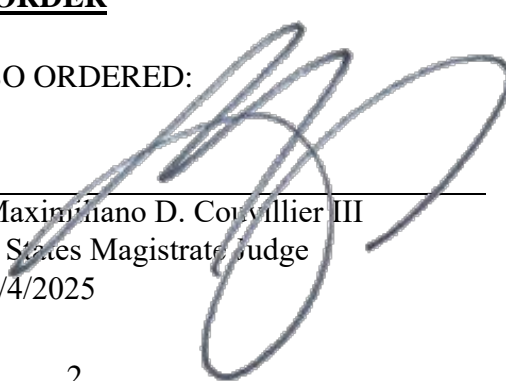
300 S. Fourth Street, Suite 900

Las Vegas, Nevada 89101

Attorneys for Defendant

ORDER

IT IS SO ORDERED:



Hon. Maximiliano D. Couvillier III

United States Magistrate Judge

Date: 4/4/2025